

WILLIAM STRAZZA
MATTHEW J. WERNER

THE LAW OFFICE OF
WILLIAM STRAZZA, LLC
COUNSELLORS AT LAW

1 Mill Ridge Lane, Suite 106, Chester, NJ 07930
T: 908-955-0734 ♦ F: 908-800-0575

Direct All Mail to:
95 W. Main Street, Suite 5-260, Chester, NJ 07930

WRITER'S EMAIL: ws@lowspc.com
WRITER'S MOBILE: 973-668-6344

September 21, 2019

Via ECF

Hon. Zahid N. Quraishi, U.S. Magistrate Judge
United States District Court, District of New Jersey Trenton
Clarkson S. Fisher Federal Building & U.S. Courthouse
402 E. State Street
Trenton, NJ 08608

Re: Najib Nabi v. Abrams, et al.
Case No: 3:18-cv-04099-AET-ZNQ

Your Honor,

We represent Plaintiff. There is a conference scheduled in this matter (for the parties remaining following the recent order from Judge Thompson dismissing the public entity defendants) on September 25, 2019. I write to request the conference be adjourned. It is my understanding all parties and counsel who remain in the case consent.

The reason for the request is as follows and requires a short review of the procedural history in this matter. This case came to the Federal Court following removal from State Court by former public entity defendant, Middlesex County Prosecutor's Office. At the time of removal from State Court (Middlesex County) there were two public entity defendants in the case – Middlesex County Prosecutor's Office and the City of New Brunswick. Middlesex County Prosecutor was voluntarily dismissed by Plaintiff earlier this year. Thereafter, the City of New Brunswick filed an application for dismissal, which was granted by Judge Thompson on June 30, 2019.

It is the collective view of the parties remaining in the case that with all public entity defendants dismissed from the case, there are no longer any viable Federal claims and the matter should be removed back to State Court. Accordingly, we request that the September 25, 2019

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conference be adjourned so that the remaining parties may take the appropriate steps to remove the case back to State Court. Thank you for the time and consideration.

Respectfully,

William Strazza /s/

William Strazza

Cc: All Counsel of record (via ECF)